

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Jeaneen Shartrice Townes)	
)	
)	Case No. <u>13-36245-KRH</u>
)	
)	
Debtor(s))	Chapter <u>13</u>
)	
Address <u>227 South Cedar Ave</u>)	
<u>Henrico, VA 23075</u>)	
)	
Last four digits of Social Security No(s): <u>4309</u>)	
)	
)	

NOTICE OF MOTION

Jeaneen Shartrice Townes has filed papers with the court to Substitute Counsel.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before January 14, 2015, you or your attorney must:

X File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

America Law Group, Inc.
8501 Mayland Dr., Ste 106
Henrico, VA 23294

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☐ Attend the hearing on the motion (or objection) scheduled to be held on _____ at _____ . m. at
United States Bankruptcy Court, 701 East Broad Street, Ctrm
<5100/5000> Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 12/31/2014

Signature, name, address, and telephone
number of person giving notice:

/s/ Sean D. Contreras

Sean D. Contreras, Esq.

America Law Group, Inc.

8501 Mayland Dr., Ste 106

Henrico, VA 23294

VSB No. 42677

Counsel for Jeaneen Shartrice Townes

Certificate of Service

I hereby certify that I have this 31st day of December, 2014, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

/s/ Sean D. Contreras
Sean D. Contreras, Esq.

Creditors

Accounts Receivable Management

PO Box 129

Thorofare, NJ 08086-0129

Alliance One

4850 Street Rd, Ste 300

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Allied Cash Advance

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EASTERN DISTRICT OF VIRGINIA
Richmond Division

IN RE:)	
)	
Jeaneen Shartrice Townes)	Case No.: 13-36245-KRH
)	Chapter 13
Debtor)	

Amended MOTION FOR SUBSTITUTION OF COUNSEL

COMES NOW Jeaneen Shartrice Townes the Debtor herein and moves the Court to allow the substitution of Sean D. Contreras, Esquire and in support thereof states as follows:

1. Jeaneen Shartrice Townes filed a petition for relief under Chapter 13 of the Bankruptcy Codes on 11/19/2013 and was assigned case number 13-36245.
2. The current bankruptcy case was filed with Roger C. Hurwitz of Woehrle Franklin Dahlberg Jones PLLC.
3. Debtor has signed consent authorizing Sean D. Contreras to substitute as attorney.

WHEREFORE, the Debtor moves the Court to allow the substitution of Sean D. Contreras, Esquire, as counsel for the Debtor in place of Roger C. Hurwitz, as per the request of the Debtor.

NOTICE IS HEREBY GIVEN PURSUANT TO LOCAL RULE 9013-1, UNLESS A WRITTEN RESPONSE TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY WITHIN FOURTEEN (14) DAYS OF THE SERVICE OF

THIS MOTION TO SUBSTITUTE COUNSEL, THE COURT MAY DEEM ANY
OPPOSITION WAIVED AND ISSUE AN ORDER SUSTAINING THE MOTION
WITHOUT FURTHER NOTICE OR HEARING.

Respectfully submitted,
Jeaneen Shartrice Townes

By: /s/ Sean D. Contreras, Esquire
Sean D. Contreras, Counsel

I ask for this:

/s/ Jeaneen Shartrice Townes
Jeaneen Shartrice Townes

Sean D. Contreras, Esquire
VSB # 42677
America Law Group, Inc.
8501 Mayland Dr. Ste 106
Henrico, VA 23294
Ph: 804-308-0051

Seen and agreed:

/s/ Roger C. Hurwitz

Roger C. Hurwitz
Woehrle Franklin Dahlberg Jones PLLC

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing Motion was mailed by electronic means or by first class USPS mail, postage prepaid to Robert Hyman, Chapter 13 Trustee, Roger C. Hurwitz of Woehrle Franklin Dahlberg Jones, and all necessary parties, listed below, on 12/31/2014.

/s/ Sean D. Contreras

Sean D. Contreras, Esq.

Creditors

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In Re:)	
Jeaneen Shartrice Townes)	Case No.: 13-36245-KRH
)	
Debtor)	Chapter 13
)	

**PROPOSED ORDER AUTHORIZING
SUBSTITUTION OF COUNSEL**

Came this day the debtor, by counsel, and upon Debtor's Motion to Substitute Counsel, and the Court having considered the motion I detail, and finding it in order and proper to approve the same, it is hereby

ORDERED that ATTORNEY be allowed and is hereby granted relief to withdraw and is withdrawn as counsel for the debtor and that Sean D. Contreras is hereby substituted as counsel for Debtor in this action.

Entered _____.

United States Bankruptcy Judge

Entered on docket: _____.

We ask for this:

/s/ Sean D. Contreras
Sean D. Contreras, VSB 42677
America Law Group, Inc.
Debt Law Group
8501 Mayland Dr., Ste 106
Henrico, VA 23294
Ph: 804-308-0051
Proposed Counsel for Debtor

/s/ Jeaneen Shartrice Townes
Jeaneen Shartrice Townes

Seen and agreed:

Roger C. Hurwitz
Woehrle Franklin Dahlberg Jones PLLC

CERTIFICATE OF SERVICE

Pursuant to Local Rules of this Court, I hereby certify that this proposed Order was either endorsed by or a true copy was served on all necessary parties via first-class mail, postage prepaid on this the 31st day of December, 2014, including those parties listed on the attached Service List.

/s/ Sean D. Contreras

Sean D. Contreras

Jeaneen Shartrice Townes
227 South Cedar Ave Henrico, VA 23075

Sean Contreras
America Law Group
8501 Mayland Dr. Ste 106 Henrico, VA 23294

Roger Hurwitz
Woehrle Franklin Dahlberg Jones
2016 Lafayette Blvd. Ste. 101 Fredericksburg, Virginia 22401

Robert Hyman
PO Box 1780 Richmond, VA 23219

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